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Federal Defenders OF NEWYORK, INC.

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David E. Patton

Executes Director

and Attorney in-Chief

Southern District of New York Jennifer L. Brown Attorney in Charge

June 2, 2022

VIA ECF & EMAIL

The Honorable Paul E. Davison United States District Judge Southern District of New York 300 Quarropas Street, White Plains, NY 10601

Re: United States v. Dimas Ramirez, 21-cr-3591 (UA)

Dear Honorable Judge Davison:

I write to respectfully request that the Court modify Mr. Ramirez's bail conditions to permit certain travel to the District of New Jersey on Friday, June 3, 2022, to pick up his car.

On May 26, 2022, I filed a letter motion making certain travel requests. See ECF Doc. 33. The first of those requests was for Mr. Ramirez to be permitted to travel to the District of New Jersey on May 31st to drop off his car to be fixed and on June 1st to pick up his car. This request, and the three other travel requests I made, were granted. See ECF Doc. 35.

Mr. Ramirez did drop off his car on May 31, 2022, but he learned yesterday that his car would not be ready. The mechanic indicated he could pick it up tomorrow or Friday. Given the late notice of this request, he respectfully requests permission to travel to the District of New Jersey on Friday, June 3, 2022 to pick up his car from the mechanic.

Mr. Ramirez's Pre-trial Officer, Leo Barrios, has <u>no objection to</u> this request. I have contacted the Government, through Assistant United States Attorney Marcia Cohen, who also has no objection to this request. Thank you for your time and consideration of this matter.

Respectfully submitted,

Elizabeth K. Quinn

Assistant Federal Defender

ce: Marcia Cohen, AUSA Leo Barrios, PTO

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APPLICATION GRANTED

Hon, Paul E. Davison, U.S.M.J.

6/2/22